

UNITED STATES DISTRICT COURT  
DISTRICT OF KANSAS

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
BRISBEN CHIMNEY HILLS	)	Civil Action No. _____
LIMITED PARTNERSHIP;	)	
MBS GP 5, LLC; JRK	)	
RESIDENTIAL AMERICA,	)	
LLC; CASEY MCGOWAN;	)	
LAURA BALL; and MEREDITH	)	
HINKLIN,	)	
	)	
Defendants.	)	
_____	)	

**UNOPPOSED MOTION FOR ENTRY OF CONSENT ORDER**

Plaintiff, United States of America, respectfully moves the Court for entry of the proposed Consent Order, attached hereto, to resolve the United States’ civil action brought to enforce the Fair Housing Act, 42 U.S.C. §§ 3601-3631. Plaintiff United States of America and Defendants Brisben Chimney Hills Limited Partnership; MBS GP 5, LLC; JRK Residential America, LLC; Casey McGowan; Laura Ball; and Meredith Hinklin (collectively “the Parties”) have resolved all allegations in the United States’ complaint by this proposed Consent Order, memorialized by signatures at pages 27-28 (multiple). Undersigned counsel Katharine F. Towt, counsel for the United States of America, has conferred with counsel for the Defendants; through counsel, all Defendants have consented to the entry of the attached Consent Order. In light of the Parties’ agreement, the United States files this unopposed motion for approval and entry of the attached proposed Consent Order as an enforceable order of the Court.

Dated: March 24, 2015

*For the United States:*

BARRY R. GRISSOM  
United States Attorney  
District of Kansas

JON FLEENOR  
Assistant United States Attorney  
District of Kansas  
500 State Ave., Ste. 360  
Kansas City, KS 66101

ERIC H. HOLDER, JR.  
Attorney General

VANITA GUPTA  
Acting Assistant Attorney General  
Civil Rights Division

STEVEN H. ROSENBAUM  
Chief  
Housing and Civil Enforcement Section

SHINA MAJEED  
Deputy Chief  
Housing and Civil Enforcement Section

/s/ Katharine F. Towt  
Katharine F. Towt (MA SBN 690461)  
Trial Attorney  
U.S. Department of Justice  
Civil Rights Division  
Housing and Civil Enforcement Section  
950 Pennsylvania Ave. NW - NWB  
Washington, D.C. 20530  
Tel: 202-353-4140  
Fax: 202-514-1116  
Email: katie.towt@usdoj.gov

### **CERTIFICATE OF SERVICE**

I hereby certify that on this 24<sup>th</sup> day of March 2015, I electronically filed the foregoing Unopposed Motion with the Clerk of the Court by using the CM/ECF system. I further certify that on this date the foregoing Unopposed Motion and Notice of Electronic filing were served via U.S. mail upon the non-CM/ECF participants:

Counsel for the Defendants Brisben, Chimney Hills Limited Partnership and MBS GP 5, LLC:

Joshua M. Schindler  
The Schindler Law Firm, P.C.  
141 N. Meramec, Suite 201  
St. Louis, MO 63105

Counsel for the Defendants JRK Residential America, LLC; Casey McGowan; Laura Ball; and Meredith Hinklin:

Gregory Hurley  
Sheppard, Mullin, Richter & Hampton LLP  
650 Town Center Drive  
Fourth Floor  
Costa Mesa, CA 92626

/s/ Katharine F. Towt  
KATHARINE F. TOWT  
Trial Attorney